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July 28, 2022

*Via ECF*

Hon. Barbara Moses  
United States District Court  
Southern District of New York  
Daniel P. Moynihan United States Courthouse  
500 Pearl Street, Room 740  
New York, NY 10007

Re: Fashion Leaf Garment Co. Ltd. et al. v. Ringerjeans LLC et al.  
Civil Action No. 1:19-CV-03381-AC  
Request for Extension of Deadlines

Dear Magistrate Moses:

As counsel for the Defendants in the above referenced matter, I respectfully submit this letter with the consent of all counsel to bring the Court up to date on the parties' discovery and to request a further consensual extension of the fact discovery deadline, which is currently set for August 1, 2022.

Following the untimely death of counsel to the original plaintiffs, new counsel was retained, and we provided copies of prior discovery to insure that there are no gaps in the paper discovery. We had expected to conduct the deposition of Alex Zhao, principal of the plaintiffs, earlier this month, following which my client's principal would sit for deposition, completing fact discovery.

Unfortunately, circumstances arose which prevented us from proceeding as planned. My wife and I are the primary caregivers for my mother-in-law, who is in the late stages of dementia. Both she and my wife contracted Covid-19 during the Fourth of July holiday. While they have now recovered with no apparent long term issues, my care of them created a backlog in my work. On July 14, 2022, my firm suffered a ransomware attack which led to a loss of access to emails and certain files. The problems related to this attack were resolved this past weekend. Fortunately, all of the files for this case have been recovered.

At this point, between the press of matters which were necessarily adjourned into August, and multiple-day hearings in other matters already scheduled for August, I am compelled to request that the deposition of Mr. Zhao be held during the week of September 5, with the deposition of the defendant's representative held during the week of September 19.

I have kept counsel for the original plaintiffs and the intervenor plaintiff up to date on these issues, and they have been very courteous and understanding. They have both consented to the proposed schedule, which will require extending the discovery completion deadline to late September, with a deadline of 45-days thereafter for the filing of dispositive motions.

I also request that the status conference currently scheduled for August 11, 2022 be adjourned to a date convenient to the Court in late September.

Thank for your consideration of the foregoing.

Respectfully yours,

/s/ J. Ted Donovan

cc: Charles Wizenfeld, Esq. (via ECF)  
Michael Cassell, Esq. (via ECF)